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2. On or about December 11, 2015, Defendants received copies of the Summons and Complaint. Copies of the Summons and Complaint Defendants received are attached hereto as **Collective Exhibit A**.

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332(a)(1), and may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. §§ 1441 and 1446.

4. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), having been filed within thirty (30) days after Defendants' receipt of the Summons and Complaint.

5. This action is removable on the basis of diversity of citizenship pursuant to 28 U.S.C. § 1332(a)(1). Plaintiff is a citizen and resident of Tennessee. Defendant Elaine Badejo is a citizen and resident of Washington. Defendant Badejo Insurance Agency is a Washington sole proprietorship with its principal place of business in Puyallup, Washington. Defendant Farmers Insurance Company of Washington is a Washington corporation with its principal place of business¹ in Olympia, Washington. Defendant Foremost Insurance Company is a Delaware corporation with its principal place of business in Caledonia, Michigan.

6. As set forth in Plaintiff's demand for monetary relief in the Complaint, the amount in controversy exceeds \$75,000.00 pursuant to 28 U.S.C. § 1332(a).

7. This action has been properly removed to this district court as 28 U.S.C. § 1446(a) specifies that the notice of removal shall be filed in the district court of the United States for the district in which such action is pending. Pursuant to 28 U.S.C. § 123(a)(3), this district and division encompasses Hamilton County, Tennessee, where the action was pending prior to removal.

¹ The "principal place of business" is best read as referring to the place where a corporation's officers direct, control and coordinate the corporation's activities. It is the place that Courts of Appeals have called the corporation's nerve 'center.'" Hertz Corp. v. Friend, 559 U.S. 77 (2010).

8. Pursuant to 28 U.S.C. § 1446(d), Defendants will promptly file a Notice of Filing of Notice of Removal with the Clerk of the Circuit Court for Hamilton County, Tennessee, with a copy to be served on Plaintiff's counsel. A copy of the Notice of Filing of Notice of Removal is attached hereto as **Exhibit B**.

9. Pursuant to 28 U.S.C. § 1446(a), Defendants have attached as **Collective Exhibit A**, a copy of all process, pleadings and orders served upon Defendants in the state court action.

10. By removing this action, Defendants do not waive any defenses, objections or motions available to them under state and federal law.

WHEREFORE, Defendants, pursuant to 28 U.S.C. §§ 1441 and 1446, respectfully submit, based upon the allegations set forth in this Notice of Removal, that this action is properly removed and request that this Court retain jurisdiction over this action.

DATED: January 6, 2016

Respectfully submitted,

TAYLOR, PIGUE, MARCHETTI & BLAIR,
PLLC

BY: /s/ Wm. Ritchie Pigue
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system and via U.S. Mail upon the following this 6th day of January, 2016:

Mr. Samuel T. Quattrochi
Attorney for Plaintiff
801 Broad Street
Suite 428
Chattanooga, TN 37402

/s/ Wm. Ritchie Pigue
Wm. Ritchie Pigue